

February 7, 2022

Mr. David Albright
Manager, Groundwater Protection Section
USEPA Region 9 (WTR-4-2)
75 Hawthorne St
San Francisco, CA 94105

Subject: Monthly Report for AL Exceedance for Sulfate at Operational Monitor Well MW01-O
Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1

Dear Mr. Albright:

Florence Copper is providing this monthly report following an alert level (AL) exceedance for sulfate at operational monitor well MW01-O under Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1 (Permit). The last monthly update report was submitted on January 7, 2022. A monthly groundwater sample was collected on January 12, 2022 and the results are shown in Table 1.

MW01-O is located northwest of Florence Copper's Production Test Facility (PTF) wellfield. The closest oxide observations wells are M57-O to the southeast, and M58-O to the northeast. Both wells' sulfate concentrations are below their respective ALs. Monitor wells M54-O and M22-O, downgradient from MW01-O, also show sulfate concentrations below their ALs.

Florence Copper is currently in the rinsing phase of operations. Redeveloping injection, recovery, and observation wells during this phase improves well efficiencies and decreases analyte concentrations related to precipitate buildup. In January, recovery wells R-07 and R-08, which are upgradient of MW01-O, were redeveloped. An additional mitigation effort included increasing recovery flows on the northwest side of the wellfield.

Hydraulic control has been maintained as required by the permit throughout operation of the PTF and continues today. No other analytes exceeded their respective alert levels.

Table 1. MW01-O sulfate results

| MW01-O | | | |
|------------|-----------|------------|----------------|
| Date | UIC AL | UIC AQL | Sulfate (mg/L) |
| 10/20/2021 | 229 | -- | 250 |
| 11/22/2021 | 229 | -- | 240 |
| 12/13/2021 | 229 | -- | 230 |
| 1/12/2022 | 229 | -- | 240 |

Florence Copper will continue monthly sampling for MW01-O until sulfate returns to concentrations below the AL. The next sample will be collected in February during the routine quarterly sampling event.

Please feel free to contact me should you have any questions or comments.

Sincerely,
Florence Copper, Inc.



Brent Berg
General Manager

cc: Nancy Rumrill, EPA Region 9
Daniel Reeder, ADEQ